

BEFORE THE TENNESSEE REGULATORY AUTHORITY

Nashville, Tennessee

In Re:

*Enforcement of Interconnection Agreement between BellSouth
Telecommunications, Inc. and XO Tennessee, Inc.*

*Enforcement of Interconnection Agreement between BellSouth
Telecommunications, Inc. and ITC^DeltaCom.*

Docket No. 02-01203

ITC^DELTA COM'S FIRST ROUND OF DISCOVERY QUESTIONS

ITC^DeltaCom hereby submits the following interrogatories to BellSouth Telecommunications, Inc.

Preliminary Matters and Definitions

When not otherwise specified the term "BellSouth" refers to BellSouth Telecommunications, Inc. and/or to any affiliated corporate entity, engaging in the offering of regulated telephone services in Tennessee.

With respect to each of the following interrogatories, in addition to supplying the information requested, please identify any and all documents that support, refer to, or evidence the subject matter of each interrogatory in your answers thereto. If any or all of the documents identified herein are no longer in your possession, custody or control because of destruction, loss, or other reason, then you are requested to identify each such document fully, including the nature and type of the document, its date, the identity of the person who prepared the document, and the identity of the person or entity for whom it was prepared, and to the extent possible, you are requested to summarize the contents of the document and state the manner and date of the disposition thereof. If any of the requested documents are objected to or not produced on the

basis of privilege, please include in your response to production, for each document, a written statement evidencing:

- a. The nature and type of the document;
- b. The date;
- c. The author of the document;
- d. The recipient;
- e. The sender; and
- f. A brief description of the contents sufficient to allow the TRA to rule on a motion to compel.

Consistent with the preceding definitions and preliminary matters, answer under oath the following:

INTERROGATORIES

1. Produce the contract between BellSouth Telecommunications, Inc. ("BellSouth") and American Consultants Alliance ("ACA").

ANSWER:

2. Produce any emails, correspondence, documents between BellSouth and ACA concerning EEL audits.

ANSWER:

3. Produce any studies, analysis, or documents that would show that BellSouth has a reason to believe that ITC^DeltaCom's ("ITCD") new loop-transport combinations are not within safe harbor limits and any specific metrics applied to the study or the analysis.

ANSWER:

4. Produce any and all evidence within BellSouth's possession that was used by BellSouth to determine that BellSouth has reason to require an audit of ITCD in Tennessee.

ANSWER:

5. Is it BellSouth's practice to require a certification (*i.e.* identification of the safe harbor) from ITCD prior to converting a special access circuit to an EEL?

a. If yes, provide the form BellSouth requires ITCD to submit to BellSouth.

b. Is ITCD required to fax that form to BellSouth?

c. If so, to what department at BellSouth is ITCD required to fax the form?

ANSWER:

6. Is it BellSouth's practice to require ITCD to provide a certification to BellSouth prior to completing a request for a new loop-transport combination?

a. If yes, please produce the form that BellSouth requires to be completed prior to working the request for a new loop-transport combination.

b. Indicate where on that form ITCD must identify the safe harbor certification for the new loop-transport combination.

c. Is ITCD required to fax the request for a new loop-transport combination?

d. If so, to what department at BellSouth is ITCD required to fax that form?

e. What department at BellSouth accepts requests for new loop-transport combinations?

ANSWER:

7. Describe the audit methodology to be used by ACA.

ANSWER:

8. Provide copies of all documents pertaining to the scope of ACA's Alliance employment and their engagement agreement including all information that would reflect its independence according to AICPA rules.

ANSWER:

9. Provide a description of the scope, date, and cost of any other work ACA has performed for BellSouth.

ANSWER:

10. Provide the names and background of the individuals employed by ACA who will be involved in the audit.

ANSWER:

11. Describe whether the individuals described above have ever performed any other work for BellSouth and, if so, a description of the scope, date, and cost of the work performed.

ANSWER:

Respectfully submitted,

By: Henry Walker

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Counsel for ITC^DeltaCom


Dated this 14th day of February, 2003.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been forwarded via U.S. Mail, postage prepaid, to the following on this the 14th day of February, 2003.

Guy Hicks, Esq.
BellSouth Telecommunications, Inc.
333 Commerce St., Suite 2101
Nashville, TN 37201-3300

R. Douglas Lackey, Esq.
675 Peachtree St., NE, Suite 4300
Atlanta, GA 30375

A handwritten signature in cursive script, reading "Henry Walker", written in dark ink.

Henry Walker